

# MORRISON MAHONEY LLP

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October 18, 2021

## **Via ECF**

Hon. Peggy Kuo  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: Allstate Ins. Co. v. Mirvis, No. 08-CV-4405 (PKC) (PK)**

Dear Magistrate Judge Kuo:

Along with Cadwalader, Wickersham & Taft LLP, we represent Plaintiffs-Judgment Creditors ("Plaintiffs") in the above-referenced matter, and write in accordance with the Court's October 8, 2021 Docket Order directing Plaintiffs to inform the Court how Plaintiffs intend to proceed with the 289 Bayberry Property (the "Property"). In that regard, Plaintiffs are in the process of identifying potential buyers for Judgment Debtor Mark Mirvis's ("Mirvis") interest in the Property, and intend to continue such search until the Judgment in this matter is satisfied or otherwise resolved, or until Mark Mirvis's interest in the Property transfers to his wife by operation of law.

In addition, as alluded to by the Second Circuit Court of Appeals during oral argument in connection with L. Mirvis's challenge to the District Court's Order eliminating the Mirvises' tenancy by the entirety, Plaintiffs intend to seek attorneys' fees and costs relating to Plaintiffs' successful efforts to have the transfers of interest in the Property, by and between the Mirvises, declared fraudulent.

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Thank you for the Court's consideration.

Very truly yours,

**MORRISON MAHONEY LLP**

By: /s/ Daniel S. Marvin  
Daniel S. Marvin, Esq.

cc: All Counsel (via electronic filing)